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January 31, 2012

VIA ELECTRONIC MAIL AND REGULAR MAIL

Chairman Julius Genachowski
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Commissioner Robert M. McDowell
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Commissioner Mignon Clyburn
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

**Re: ACA International Request for Meeting
CG Docket No. 02-278**

Dear Chairman Genachowski and Commissioners McDowell and Clyburn:

On behalf of ACA International (ACA) and its 5,500 member companies, this letter is in further reference to ACA's comments in the above-referenced docket and ACA's concern that the Commission not construe the Telephone Consumer Protection Act ("TCPA") to interfere with communications to consumers solely for the non-telemarketing purpose of recovering payments.

Since 2003, ACA has worked with the Commission to address the Commission's interpretation of the TCPA that a predictive dialer used to communicate with a consumer about the status of his or her account is an automatic telephone dialing system

(“autodialer”). This interpretation negates more than a decade of Commission precedent that debt collectors are not subject to the autodialer prohibition when making non-telemarketing calls to recover payment obligations for goods or services. It also conflicts with, and fails to achieve maximum consistency with, the Federal Trade Commission’s conclusion that debt collectors are not subject to analogous autodialer restrictions under the Telemarketing Sales Rule.

The debt collection industry annually returns \$55 billion to our economy. *See* Ernst & Young “The Impact of Third-Party Debt Collection on the National and State Economies” (2012) (enclosed). Economic contributions on this scale are threatened by an interpretation of the TCPA that interferes with the use of predictive dialers and the ability to communicate with consumers on wireless devices.

The Commission’s Declaratory Ruling in 2008 clarified that autodialed calls to wireless devices in connection with an existing debt are permissible as calls made with prior express consent of the called party. The Commission concluded that the provision of a cell phone number evidences prior express consent to be called regarding a debt. With the 2008 Declaratory Ruling in mind, ACA wishes to respectfully emphasize the following points concerning the Robocall Report and Order:

1. The Robocall Report and Order should affirm prior Commission statements, illustrated below, that debt collection calls are not prohibited by the TCPA autodialer rules.

a. “The use of auto dialers in debt collection increases the efficiency of the collector who no longer has to deal with unanswered calls, and is beneficial to the called party by making them aware of the company’s inquiry. To the extent such practices comply with all other state or federal debt collection laws, it appears that *this is a non-telemarketing use of auto dialers not intended to be prohibited by the TCPA.*” *See* Notice of Proposed Rulemaking in the Matter of the Telephone Consumer Protection Act of 1991, 7 FCC Rcd 2736, at ¶ 15 (rel. April 17, 1992) (emphasis added).

b. “With respect to concerns regarding compliance with both the FDCPA and our rules in prerecorded message calls, we emphasize that the identification requirements will not apply to debt collection calls because *such calls are not autodialer calls (i.e., dialed using a random or sequential number generator)* and hence are not subject to the identification requirements for prerecorded messages in 64.1200(e)(4) of our rules. Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991, CG Docket No. 02-278, Report and Order, 7 FCC Rcd 8752, ¶ 39 (footnotes omitted, emphasis added).

January 31, 2012

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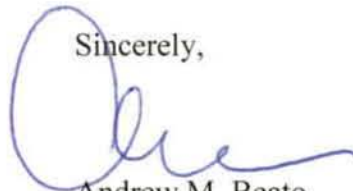
Affirming these prior findings is supported by undisputed declarations of predictive dialer companies in this docket stating that dialer hardware and software configurations used for debt collection do not have the capacity to (a) store or generate telephone numbers using a random or sequential number generator; and (b) randomly or sequentially generate telephone numbers using a number generator.

2. The Robocall Report and Order should be consistent with the 2008 Declaratory Ruling. No new requirement of written prior express consent should be imposed for debt collection calls. The Commission should re-affirm that prior express consent for a debt collection call is obtained when a consumer provides a telephone number for the account.

3. The Robocall Report and Order should clarify that prior express consent attaches to the account creating the debt, and not the telephone number. Focusing prior express consent on the account, as opposed to a telephone number, avoids significant problems that arise when a consumer switches carriers without porting his or her number.

We welcome an opportunity to brief you on the importance of these issues so that meaningful recovery of these payment obligations is not jeopardized.

Sincerely,



Andrew M. Beato
Federal Regulatory Counsel
ACA International

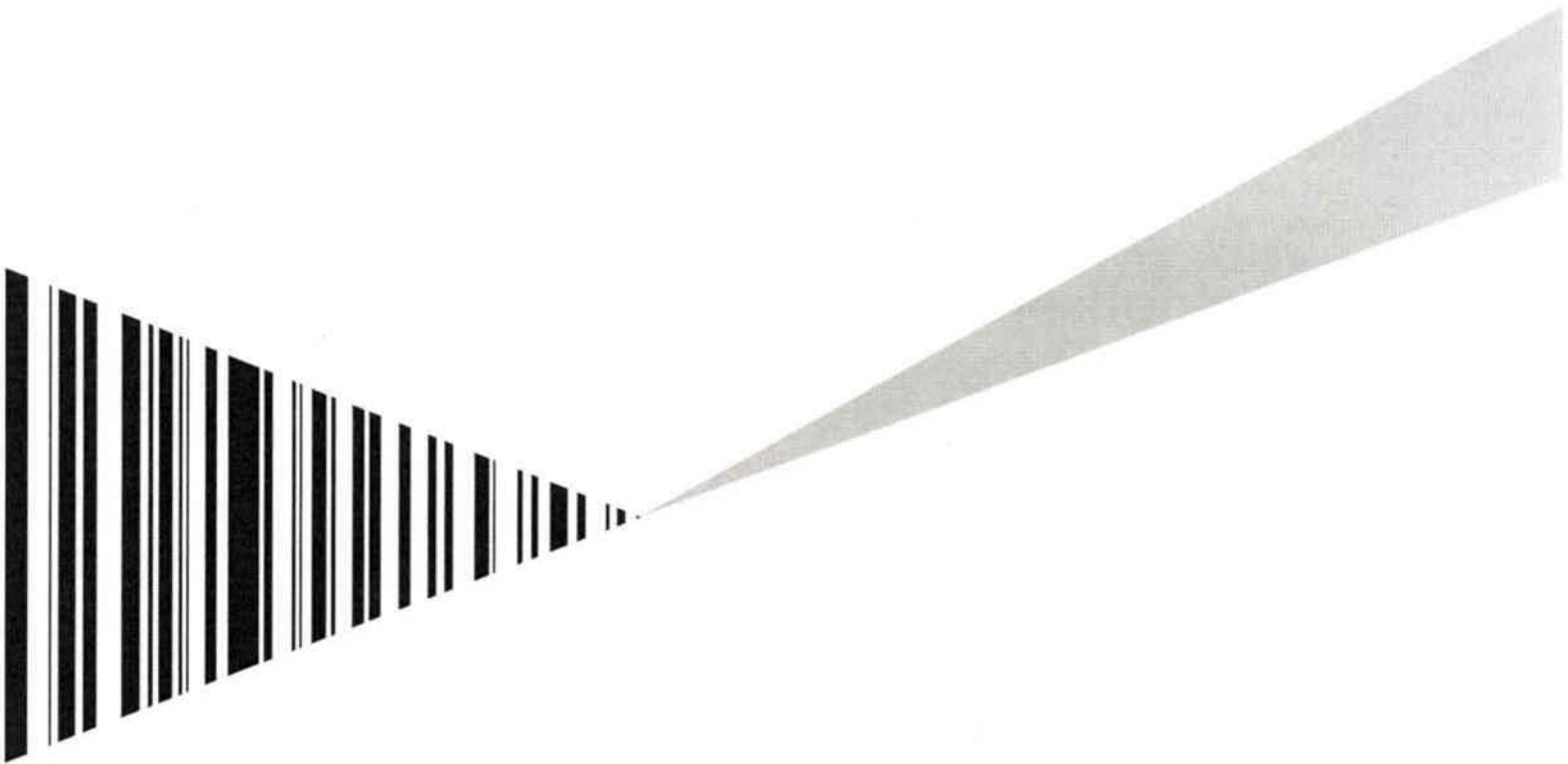
Enclosures:

- (1) Ernst & Young "The Impact of Third-Party Debt Collection on the National and State Economies" (2012)
- (2) 2008 Declaratory Ruling

cc: Adam Peterman (w/enclosures)

The Impact of Third-Party Debt Collection on the National and State Economies

January 2012



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Executive Summary

The third-party debt collection industry employs thousands of Americans and indirectly influences the employment of thousands more. By recovering tens of billions of dollars in delinquent consumer debt each year that would otherwise go uncollected, the industry generates important benefits to the U.S. economy. To develop a more complete picture of the economic importance of the third-party debt collection industry, ACA International ("ACA") commissioned Ernst & Young to conduct a survey of third-party debt collection agencies. Survey data collection took place between September and November of 2011 to ACA members and non-member contacts which the ACA provided.

The resulting study, *The Impact of Third-Party Debt Collection on the National and State Economies*, gives estimates of key metrics that provide an overview of the third-party debt collection industry in the United States for 2010. Key measures of industry size and impact include the following:

- Agencies recovered approximately \$54.9 billion in total debt in 2010, on which they earned \$10.3 billion in commissions. Removing commissions from the total debt recovered leaves over \$44.6 billion in debt that agencies returned on a commission basis to creditors and the U.S. economy. The five states with the highest total debt collected are Texas (\$5.3 billion), New York (\$5.3 billion), California (\$4.4 billion), Florida (\$2.8 billion) and Illinois (\$2.7 billion).
- Early out debt, consisting of receivables that aged 90 days or less, represents 30% of all debt collected; bad debt, which accounts for the remaining 70%, consists of receivables aged 90 days or more.
- Health Care related debt is the leading category of debt collection among survey respondents, accounting for more than half of all debt collected in the industry. Credit card/financial debt is the next category with 20% of debt collected. Utility/telecom, student loans, commercial and government debt each make up less than 10 percent of debt collected.
- There are approximately 148,300 employees in the industry, including 133,900 fulltime employees, 12,900 part time and 1,500 contract employees. The total industry payroll is nearly \$5.0 billion; another \$1.8 billion is spent on non-labor expenditures. Third-party debt collection agencies made a total of \$85 million in charitable contributions in 2011, and industry employees spent approximately 652,000 hours at company sponsored volunteer activities.
- Besides the 148,300 people employed directly, U.S. debt collection agencies support the indirect and induced employment of an additional 152,900 individuals in industries that sell goods and services to debt collection agencies and their employees. Considering both the direct and indirect economic impacts of the debt collection industry, the total employment impact on the U.S. is nearly 302,000 jobs with a total payroll impact of \$10.1 billion.
- U.S. debt collection agencies were estimated to directly create \$495 million of federal tax, \$288 million of state tax, and \$221 million of local tax, for a combined tax impact of more than \$1 billion. Taxes attributable to the operations of debt collection agencies employees, suppliers, and businesses that sell to employees total nearly \$2.0 billion – approximately 10% of the estimated total economic impact of the debt collection industry. Of the \$2.0 billion estimated total tax impact, 49% is estimated to be federal tax (corporate and individual income taxes) and 51% is estimated to be state and local taxes.

Introduction

Businesses that sell goods and services on credit must handle accounts receivable – so too must all levels of government in the collection of taxes, fines and fees. Inevitably, these organizations must decide what to do with past-due accounts and can handle the collection of these debts in one of two primary ways: they can try to collect the debt themselves (often referred to as “in-house” debt collection) or they can refer the account to a third-party debt collector. The focus of this report is on “third-party” debt collection.

The third-party debt collection industry employs thousands of Americans as collection professionals. They collect on past-due accounts referred to them by various credit grantors, such as credit card issuers, banks, retail stores, hospitals and other health care services, or by federal, state and local governments. Unpaid debt often results in higher consumer prices and uncollected taxes or fines put a significant strain on government budgets. Bad debt also results in business failure and job loss. By recovering billions of dollars in delinquent debt each year that would otherwise go uncollected, the industry generates important benefits to the U.S. economy. For consumers, the benefit of third-party debt collection can be seen through reduced consumer prices and greater consumer purchasing power. Businesses, large and small, benefit from third-party debt collection because debt recoveries help them keep costs down and reduce their risk of financial insolvency and bankruptcy that may be triggered by unrecovered bad debt. From a government perspective, the collection of delinquent taxpayer dollars reduces the need for future tax and fee increases or spending cuts.

To develop a more complete picture of the economic importance of the third-party debt collection industry, ACA International (“ACA”) commissioned Ernst & Young (“EY”) to conduct a survey of third-party debt collection agencies. The survey was fielded between September and November of 2011 to ACA members and non-member contacts which the ACA provided. Unless otherwise noted, results in this report are based on data received from this survey. We also make use of data from the United States Census Bureau and Bureau of Labor Statistics. EY also reviewed current and previous ACA research and other industry sources to conduct this analysis.

The resulting study, *The Impact of Third-Party Debt Collection on the National and State Economies*, gives estimates of key metrics that provide an overview of the third-party debt collection industry in the United States, including:

- National and state estimates of debt collected,
- Types of debt,
- Industry employment and expenses,
- Charitable contributions,
- Direct and indirect economic impacts, and
- Fiscal (tax) impacts.

This study focuses on the third-party debt collection industry as a whole. It is not a comment on any individual company, whose performance may vary from the information included in this study.

Methodology

EY designed, built, and distributed a password-secured web-based survey questionnaire for data collection (see appendix B for a copy of the survey questionnaire). Individual responses to all questions were kept completely confidential. Only EY professionals responsible for the survey had access to individual survey responses.

ACA provided EY a list of 2,863 collection agencies, to which we sent invitations to the survey website. We received responses from 345 of the agencies identified – a 12% response rate.

How good are the estimates in this report? There are two primary sources of survey error: sampling and non-sampling error. Since the entire universe of identified collection agencies received a survey, there is no sampling error and terms such as precision and confidence are not appropriate. Non-sampling error includes survey question bias, coverage and measurement error, and non-response. Non-sampling errors are present in every survey, but can be reduced with proper planning, good execution, and appropriate analysis. For this survey, we have taken the following steps to help reduce non-sampling errors at various stages of the survey process:

- The ACA annually updates its database to help reach all known collection agencies. Still we know that there are some collection agencies which were not included on the ACA's list. To help overcome this coverage error, we have supplemented our data with data from the United States Census Bureau on collection agencies in the county. They estimate that there are 4,908 collection agencies in the United States.
- EY conducted a questionnaire review session with experienced survey professionals and data providers to help clarify the meaning of key terms and new data points.
- The electronic survey contains data edit checks designed to catch most measurement errors at the point of data entry.
- We provided incentives to respond, including complimentary copies of the report for survey participants.
- The ACA and EY conducted calling campaigns and sent electronic reminders to encourage response. We followed up with respondents on confusing or inconsistent responses.
- The survey questions address expanded and updated study objectives compared with prior economic impact surveys conducted by the ACA – for example, we added questions about agency charitable activities.

We compared the distribution of responding agencies to the distribution of the universe by state and size. There are some differences in the distribution of responding agencies and the distribution of agencies as noted by the U.S. Census Bureau. As a result we combined our survey results with U.S. Census data to help adjust for this potential response bias. Appendix A contains a full description of this methodology.

Report Overview

The remainder of this report contains an analysis of the data obtained using the methodology described above. It contains the following sections of analysis

- Debt Collections
- Types of Debt Collected
- Employment and Expenses
- Charitable Contributions
- Economic and Fiscal Impacts

Debt Collections

Table 1 shows the total debt recovered by third-party debt collectors in the United States for 2010. Agencies recovered nearly \$54.9 billion in total debt, on which they earned \$10.3 billion in commissions. Removing commission amounts from the total debt recovered leaves more than \$44.6 billion in debt that agencies returned on a commission basis to creditors and the U.S. economy.

Table 1: Debt Recovered by U.S. Third-Party Debt Collection Agencies in 2010

Economic Measure	Estimated Value (\$M)
Debt Recovered	\$54,882
Commission Collected	-\$10,261
Net Debt Returned	\$44,621

As noted in the introduction, this represents a real benefit to American households, businesses and creditors. The \$44.6 billion in net debt returned represents \$396 in savings on average per household¹. For businesses it is also equal to 2.5% of US corporate profits before tax, 4.7% of before tax profits of US domestic non-financial corporations and 9.0% of before tax profits of US domestic financial corporations². Finally, from a creditor perspective, it is roughly 1.8% of total consumer credit outstanding³.

Table 2 presents the total debt collected by state for 2010. The five states with the highest total debt collected are Texas (\$5.3 billion), New York (\$5.3 billion), California (\$4.4 billion), Florida (\$2.8 billion) and Illinois (\$2.7 billion). Appendix A contains a description of the methodology used to derive state estimates of total debt collected. Since the number of survey responses was sparse for some states, EY used regional estimates of commission rates to derive state estimates of total commissions.

¹ According to the US Census Bureau there were 113 million households in the United States from 2005-2009, the most recent period of data available - <http://quickfacts.census.gov/qfd/states/00000.html>

² "Flow of Funds Accounts of the United States" Release Z.1 Third Quarter 2011 – Table F.7

³ "Flow of Funds Accounts of the United States" Release Z.1 Third Quarter 2011 – Table D.3

Table 2: Debt Recovered by Third-Party Debt Collection Agencies in 2010 - by State

State	Total Debt Collected	Total Commissions	Debt Returned
Alabama	\$753.8	\$118.4	\$635.4
Alaska	\$74.2	\$17.6	\$56.6
Arizona	\$2,274.3	\$538.8	\$1,735.5
Arkansas	\$435.4	\$68.4	\$367.0
California	\$4,400.6	\$1,042.6	\$3,358.0
Colorado	\$1,160.4	\$274.9	\$885.5
Connecticut	\$258.3	\$55.0	\$203.3
Delaware	\$387.7	\$60.9	\$326.8
District of Columbia	\$1.6	\$0.2	\$1.3
Florida	\$2,836.3	\$445.6	\$2,390.7
Georgia	\$2,277.8	\$357.8	\$1,920.0
Hawaii	\$36.2	\$8.6	\$27.6
Idaho	\$128.7	\$30.5	\$98.2
Illinois	\$2,658.4	\$442.3	\$2,216.1
Indiana	\$787.5	\$131.0	\$656.5
Iowa	\$491.7	\$81.8	\$409.9
Kansas	\$748.9	\$124.6	\$624.3
Kentucky	\$668.9	\$105.1	\$563.8
Louisiana	\$641.9	\$100.8	\$541.1
Maine	\$93.2	\$19.8	\$73.3
Maryland	\$711.9	\$111.8	\$600.0
Massachusetts	\$1,324.8	\$282.2	\$1,042.6
Michigan	\$736.4	\$122.5	\$613.9
Minnesota	\$1,833.8	\$305.1	\$1,528.7
Mississippi	\$289.1	\$45.4	\$243.7
Missouri	\$1,300.9	\$216.5	\$1,084.5
Montana	\$209.5	\$49.6	\$159.8
Nebraska	\$447.3	\$74.4	\$372.8
Nevada	\$643.3	\$152.4	\$490.9
New Hampshire	\$402.1	\$85.7	\$316.5
New Jersey	\$1,219.9	\$259.9	\$960.1
New Mexico	\$65.6	\$15.5	\$50.1
New York	\$5,310.4	\$1,131.2	\$4,179.2
North Carolina	\$808.6	\$127.0	\$681.5
North Dakota	\$106.6	\$17.7	\$88.9
Ohio	\$2,597.9	\$432.3	\$2,165.7
Oklahoma	\$777.8	\$122.2	\$655.6
Oregon	\$486.3	\$115.2	\$371.1
Pennsylvania	\$2,407.8	\$512.9	\$1,894.9
Rhode Island	\$27.4	\$5.8	\$21.5
South Carolina	\$597.3	\$93.8	\$503.5
South Dakota	\$205.5	\$34.2	\$171.3
Tennessee	\$1,999.9	\$314.2	\$1,685.8
Texas	\$5,329.2	\$837.2	\$4,492.0
Utah	\$381.1	\$90.3	\$290.8
Vermont	\$28.0	\$6.0	\$22.0
Virginia	\$1,057.4	\$166.1	\$891.3
Washington	\$1,311.3	\$310.7	\$1,000.6
West Virginia	\$355.4	\$55.8	\$299.5
Wisconsin	\$647.1	\$107.7	\$539.4
Wyoming	\$146.5	\$34.7	\$111.8
Total	\$54,881.9	\$10,261.1	\$44,620.8

Types of Debt

Figure 3 breaks out the total debt collected nationwide between early out debt and bad debt. Early out debt, representing 30% of all debt collected, consists of receivables aged 90 days or less. It typically allows the consumer a chance out of the collection process by resolving a delinquent debt before it goes into default or gets written off. Bad debt, which accounts for the remaining 70%, consists of receivables aged 90 days or more. This debt has typically been written off by the creditor as uncollectable and is then turned over to third-party agencies for collection.

Figure 3: Debt Recovered by Category

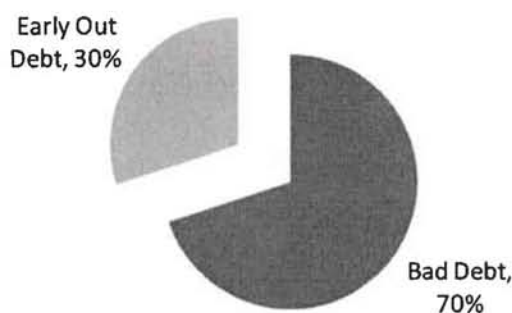


Table 4 shows the total debt collected in 2010 by type of debt. Health Care related debt is the leading category, accounting for more than half of all debt collected in the industry. Credit card/financial debt is the next category with 20% of debt collected. Utility/telecom, student loans, commercial and government debt each make up less than 10 percent of debt collected.

Table 4: Debt Recovered by Third-Party Debt Collection Agencies in 2010 - by Type of Debt

Debt Type	Percent of Total Debt Collected
Health Care	52.2%
Credit card/financial	20.0%
Utility/telecom	7.5%
Student Loan	5.7%
Commercial	3.4%
Government	2.1%
Other	9.1%
Total	100%

While many associate consumer debt with typical consumer loans such as those for mortgages, cars and credit cards, Table 4 shows that among survey respondents the majority of debt collected was healthcare related debt. According to the American Hospital Association, U.S. hospitals provided \$36.4 billion in uncompensated care in 2008, representing 5.8 percent of annual hospital expenses⁴.

⁴ American Hospital Association, "Uncompensated Hospital Care Cost Fact Sheet," November 2009

Employment and Expenses

Table 5 shows the number of employees in the debt collection industry. There are nearly 148,300 employees in the industry, including 133,900 fulltime employees, 12,900 part time and 1,500 contract employees.

Table 5: 2010 Third Party Debt Collection Industry Employees⁵

Employee Type	Estimate
Full Time	133,872
Part Time	12,906
Contract	1,494
Total	148,272

Of these employees 62%, or 92,700, are telephone collectors. According to the ACA's 2011 *Compensation Benefits Survey, March 2011*, annual compensation (including base salary and commissions) for an entry-level, full-time collector on average ranges between \$19,000 and \$29,100. Based on an annual payroll of \$5.0 billion and 148,300 employees, earnings for all debt collection agency employees (including telephone collectors and other employees) average approximately \$33,500.

Charitable Activities

Table 6 presents the charitable activity of U.S. third-party debt collection agencies. It shows that in 2010 industry employees spent approximately 652,000 hours at company sponsored charitable activities. U.S. debt collection agencies also made a total of \$85.2 million in charitable contributions. Table 6 also lists the level of charitable activity by state. EY used regional estimates of rates of charitable contributions to derive these estimates.

⁵ Approximated using United States Census data and survey data – see appendix A for detailed explanation

Table 6: 2010 Third Party Debt Collection Industry Employees

State	Total Hours at Company Sponsored Activities	Total Charitable Contributions (\$K)
Alabama	10,100	\$1,476
Alaska	1,100	\$185
Arizona	37,000	\$5,687
Arkansas	7,200	\$853
California	61,200	\$11,004
Colorado	18,400	\$2,902
Connecticut	1,200	\$173
Delaware	5,000	\$760
District of Columbia	200	\$3
Florida	37,800	\$5,556
Georgia	29,300	\$4,462
Hawaii	700	\$90
Idaho	1,900	\$322
Illinois	29,400	\$2,204
Indiana	6,700	\$653
Iowa	5,400	\$408
Kansas	9,300	\$621
Kentucky	7,600	\$1,310
Louisiana	7,400	\$1,257
Maine	500	\$62
Maryland	7,800	\$1,394
Massachusetts	7,900	\$886
Michigan	6,600	\$611
Minnesota	17,500	\$1,520
Mississippi	3,400	\$566
Missouri	13,800	\$1,079
Montana	2,200	\$524
Nebraska	4,700	\$371
Nevada	8,400	\$1,609
New Hampshire	2,200	\$269
New Jersey	8,000	\$816
New Mexico	600	\$164
New York	33,600	\$3,553
North Carolina	10,300	\$1,584
North Dakota	1,100	\$88
Ohio	25,200	\$2,154
Oklahoma	9,100	\$1,524
Oregon	6,800	\$1,216
Pennsylvania	15,200	\$1,611
Rhode Island	100	\$18
South Carolina	10,400	\$1,170
South Dakota	1,700	\$170
Tennessee	33,700	\$3,917
Texas	95,200	\$10,439
Utah	5,300	\$953
Vermont	200	\$19
Virginia	14,500	\$2,071
Washington	19,700	\$3,279
West Virginia	2,100	\$696
Wisconsin	5,500	\$536
Wyoming	1,800	\$366
Total	652,000	\$85,162

Economic and Fiscal Impacts

U.S. debt collection agencies create economic benefits that reach beyond the direct benefits of hiring and paying collection agency employees. The industry also creates jobs at suppliers and other businesses that depend on sales to the industry and its employees.

Table 7 presents estimates of the debt collection industry's US economic impact. The impacts are measured in terms of employment, employee compensation and owner income, and economic output and include the direct, indirect, and induced impacts described below:

- Direct impacts include the jobs, compensation, and commissions associated with the activities of the debt collection agencies. The direct employment impact includes the jobs of debt collectors and management. Direct compensation includes employee salaries. Direct economic activity is equal to commissions on debt collected.
- Indirect impacts include the jobs, compensation, and economic activity associated with suppliers to the debt collection industry. These include companies that sell office supplies, telephone service, building services, and other goods and services purchased by debt collection agencies. Induced economic impacts are the jobs, compensation, and economic activity associated with purchases of goods and services by employees of debt collection agencies or indirectly affected firms. For example, the employment at grocery stores created by the purchase of groceries by debt collection agency employees is an induced impact.

To simplify the presentation of results, indirect and induced economic impacts are combined in the table and described as "indirect" impacts.

As shown in Table 7, U.S. debt collection agencies directly employ approximately 148,300 people in debt collection agencies and support the indirect and induced employment of more than 153,300 individuals in industries that sell goods and services to debt collection agencies and their employees. Considering both the direct and indirect economic impacts of the debt collection industry, the total employment impact on the U.S. nearly 302,000 jobs. This implies an average employment multiplier of 2.03, meaning that for each direct job in the debt collection industry, there are 2.03 total jobs created.⁶

Table 7 also presents the payroll of the debt collection industry. As shown in the table, the payroll impact includes nearly \$5.0 billion of direct wage and salary payments to employees of collection agencies as well as \$5.1 billion of indirect income paid to employees of businesses in other industries. Combined, these income impacts total \$10.1 billion.

In addition to the employee payroll shown in the table, the debt collection industry generated an estimated \$389 million of owner income, which resulted in nearly \$800 million of total income.

⁶ Note that the indirect impacts shown as the U.S. total indirect impacts are the sum of the individual state indirect impacts. These indirect impacts reflect the spillover benefits of activities located in the same state, but do not include the impact of debt collection agencies located in one state on the economy of another state. For example, a debt collection agency located in Illinois that purchases office supplies from Wisconsin would generate an indirect impact in Wisconsin that would not be quantified using this methodology. For this reason, the impacts are conservative.

Combining the employee income impacts shown in Table 7 with the owner income impacts, the total estimated impact of the industry on employee payroll and owner income was \$10.9 billion.

Table 8 presents the estimated direct federal, state, and local tax impact of the U.S. debt collection agency. This impact includes taxes that are paid directly by debt collection agencies (such as corporate income and property taxes) as well as taxes that are paid by employees (individual income, sales, and property tax). The estimates show that U.S. debt collection agencies were estimated to directly create \$495 million of federal tax, \$288 million of state tax, and \$221 million of local tax, for a combined state and local tax impact of more than \$1 billion.

Table 9 summarizes the total estimated direct and indirect tax impact of the debt collection industry. These impacts include taxes paid by debt collection agencies, their employees, suppliers, and businesses that sell to employees of agencies and their suppliers. As such, the total tax impact is larger than the direct tax impact by the amount of tax paid by suppliers and businesses selling to employees (such as retailers).

As shown in Table 9, total taxes attributable to the operations of debt collection agencies, employees, suppliers, and businesses that sell to employees is nearly an estimated \$2.0 billion, approximately 10% of the estimated total economic impact of the debt collection industry. Of the nearly \$2.0 billion estimated total tax impact, \$970 million (49%) is estimated to be federal tax (corporate and individual income taxes) and \$1,015 million (51%) is estimated to be state and local taxes. In addition to these tax impacts, payments to owners are estimated to create an additional \$137 million in total taxes. Considering these taxes and the total tax impact from the industry's operations, the overall tax impact is \$2.0 billion.

Table 7: Direct, Indirect, and Total Economic Impact of Debt Collection Agencies, by State

	Output				Earnings and Owner Income				Employment		
	Direct	Indirect	Total		Direct	Indirect	Total		Direct	Indirect	Total
Alabama	\$118	\$103	\$221	#	\$51	\$45	\$96	#	1,997	1,738	3,735
Alaska	\$18	\$12	\$29	#	\$6	\$4	\$11	#	175	118	293
Arizona	\$539	\$522	\$1,061	#	\$179	\$173	\$352	#	6,036	5,846	11,882
Arkansas	\$68	\$50	\$119	#	\$48	\$35	\$83	#	1,432	1,049	2,481
California	\$1,043	\$1,231	\$2,274	#	\$373	\$440	\$813	#	9,984	11,788	21,772
Colorado	\$275	\$321	\$595	#	\$103	\$120	\$223	#	3,005	3,503	6,508
Connecticut	\$55	\$50	\$105	#	\$20	\$18	\$38	#	515	471	986
Delaware	\$61	\$47	\$108	#	\$41	\$32	\$73	#	996	767	1,763
District of Columbia	\$0	\$0	\$0	#	\$1	\$0	\$1	#	30	6	36
Florida	\$446	\$470	\$916	#	\$236	\$249	\$484	#	7,494	7,913	15,407
Georgia	\$358	\$423	\$781	#	\$186	\$221	\$407	#	5,806	6,866	12,672
Hawaii	\$9	\$8	\$16	#	\$4	\$3	\$7	#	117	103	220
Idaho	\$30	\$20	\$50	#	\$9	\$6	\$15	#	303	197	500
Illinois	\$442	\$533	\$976	#	\$257	\$310	\$568	#	8,009	9,658	17,667
Indiana	\$131	\$120	\$251	#	\$63	\$58	\$120	#	1,821	1,666	3,487
Iowa	\$82	\$50	\$132	#	\$46	\$28	\$74	#	1,476	903	2,379
Kansas	\$125	\$89	\$213	#	\$73	\$52	\$126	#	2,532	1,803	4,335
Kentucky	\$105	\$94	\$199	#	\$52	\$47	\$99	#	1,512	1,354	2,866
Louisiana	\$101	\$84	\$185	#	\$55	\$46	\$102	#	1,457	1,219	2,676
Maine	\$20	\$17	\$37	#	\$6	\$5	\$11	#	211	177	388
Maryland	\$112	\$109	\$221	#	\$63	\$61	\$124	#	1,546	1,505	3,051
Massachusetts	\$282	\$284	\$566	#	\$147	\$148	\$295	#	3,349	3,370	6,719
Michigan	\$123	\$122	\$245	#	\$57	\$57	\$115	#	1,785	1,783	3,568
Minnesota	\$305	\$300	\$606	#	\$183	\$180	\$363	#	4,765	4,693	9,458
Mississippi	\$45	\$32	\$78	#	\$20	\$14	\$33	#	681	482	1,163
Missouri	\$216	\$220	\$436	#	\$125	\$127	\$252	#	3,767	3,825	7,592
Montana	\$50	\$34	\$83	#	\$11	\$8	\$19	#	365	247	612
Nebraska	\$74	\$45	\$119	#	\$46	\$28	\$74	#	1,283	769	2,052
Nevada	\$152	\$122	\$274	#	\$44	\$35	\$78	#	1,369	1,093	2,462
New Hampshire	\$86	\$78	\$164	#	\$42	\$38	\$80	#	931	846	1,777
New Jersey	\$260	\$293	\$553	#	\$125	\$141	\$266	#	3,388	3,823	7,211
New Mexico	\$16	\$12	\$27	#	\$3	\$3	\$6	#	103	77	180
New York	\$1,131	\$1,019	\$2,150	#	\$487	\$439	\$926	#	14,155	12,748	26,903
North Carolina	\$127	\$118	\$245	#	\$71	\$67	\$138	#	2,049	1,911	3,960
North Dakota	\$18	\$9	\$27	#	\$9	\$5	\$13	#	295	150	445
Ohio	\$432	\$470	\$902	#	\$232	\$252	\$483	#	6,854	7,445	14,299
Oklahoma	\$122	\$110	\$232	#	\$55	\$49	\$104	#	1,810	1,626	3,436
Oregon	\$115	\$107	\$222	#	\$33	\$31	\$64	#	1,108	1,031	2,139
Pennsylvania	\$513	\$569	\$1,082	#	\$208	\$231	\$439	#	6,396	7,098	13,494
Rhode Island	\$6	\$5	\$11	#	\$2	\$2	\$3	#	49	43	92
South Carolina	\$94	\$90	\$184	#	\$77	\$74	\$151	#	2,062	1,970	4,032
South Dakota	\$34	\$17	\$52	#	\$16	\$8	\$25	#	468	239	707
Tennessee	\$314	\$340	\$654	#	\$268	\$290	\$557	#	6,688	7,243	13,931
Texas	\$837	\$1,015	\$1,852	#	\$517	\$627	\$1,144	#	18,873	22,882	41,755
Utah	\$90	\$99	\$189	#	\$23	\$25	\$49	#	860	944	1,804
Vermont	\$6	\$4	\$10	#	\$2	\$1	\$3	#	68	50	118
Virginia	\$166	\$166	\$332	#	\$116	\$116	\$231	#	2,879	2,882	5,761
Washington	\$311	\$312	\$623	#	\$100	\$100	\$200	#	3,213	3,225	6,438
West Virginia	\$56	\$37	\$93	#	\$33	\$22	\$56	#	418	670	1,088
Wisconsin	\$108	\$97	\$204	#	\$48	\$43	\$91	#	1,487	1,337	2,824
Wyoming	\$35	\$17	\$52	#	\$8	\$4	\$13	#	301	150	451
Total US	\$10,261	\$10,497	\$20,758	0	\$4,982	\$5,117	\$10,099	0	148,272	153,302	301,574

Table 8: Direct Federal, State, and Local Taxes Generated by Debt Collection Agencies (Includes direct tax impacts from agencies and their employees, in millions of dollars)

	Direct Federal Taxes			Direct State Taxes					Direct Local Taxes				Direct Fed, State & Local Taxes
	Indiv.	Corp.	Total	Sales	Indiv.	Corp.	Other	Total	Sales	Property	Other	Total	
	Income	Income	Federal		Income	Income							
	Tax	Tax	Tax	Tax	Tax	Tax	Tax	Tax	Tax	Tax	Tax	Tax	Tax
Alabama	\$3.7	\$1.8	\$5.6	\$0.7	\$0.8	\$0.4	\$1.0	\$2.9	\$0.6	\$0.6	\$0.4	\$1.6	10.0
Alaska	0.5	0.2	0.6	0.0	0.0	0.0	0.8	0.8	0.0	0.2	0.0	0.3	1.7
Arizona	13.0	5.5	18.5	3.6	1.9	1.1	2.4	9.0	2.1	4.6	0.6	7.3	34.8
Arkansas	3.5	1.1	4.5	1.3	1.0	0.2	1.1	3.7	0.5	0.4	0.1	1.0	9.2
California	27.0	10.7	37.8	7.3	10.7	2.2	4.4	24.6	2.1	11.7	2.1	15.9	78.2
Colorado	7.5	2.8	10.3	1.0	2.0	0.6	1.0	4.5	1.4	2.9	0.4	4.8	19.6
Connecticut	1.4	0.6	2.1	0.3	0.6	0.1	0.3	1.3	0.0	0.8	0.0	0.8	4.2
Delaware	3.0	0.9	3.9	0.0	1.0	0.0	2.1	3.0	0.0	0.7	0.2	0.9	7.9
Dist of Columbia	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.1
Florida	17.1	6.9	24.0	6.1	0.0	1.4	3.7	11.1	0.4	9.6	1.9	11.9	47.0
Georgia	13.5	5.5	19.1	2.7	3.9	1.1	1.2	8.9	2.2	5.5	0.8	8.5	36.5
Hawaii	0.3	0.1	0.3	0.1	0.1	0.0	0.1	0.3	0.0	0.1	0.0	0.1	0.8
Idaho	0.7	0.3	1.0	0.2	0.2	0.1	0.1	0.6	0.0	0.2	0.0	0.2	1.8
Illinois	18.7	6.5	25.1	4.2	4.1	1.3	4.2	13.8	0.6	9.9	1.5	12.0	51.0
Indiana	4.6	1.9	6.5	1.7	1.1	0.4	1.0	4.1	0.0	1.9	0.3	2.2	12.8
Iowa	3.4	1.2	4.5	0.8	1.1	0.2	0.7	2.9	0.2	1.5	0.1	1.9	9.3
Kansas	5.3	1.8	7.1	1.4	1.8	0.4	0.9	4.4	0.5	2.3	0.2	3.0	14.6
Kentucky	3.8	1.6	5.4	1.0	1.2	0.3	1.2	3.7	0.0	0.8	0.7	1.5	10.7
Louisiana	4.0	1.6	5.6	0.8	0.8	0.3	1.2	3.1	1.2	0.9	0.2	2.3	10.9
Maine	0.5	0.2	0.7	0.1	0.2	0.0	0.1	0.5	0.0	0.3	0.0	0.3	1.4
Maryland	4.6	1.7	6.3	0.8	1.4	0.4	1.0	3.5	0.0	1.4	1.4	2.7	12.5
Massachusetts	10.7	3.2	13.9	2.0	4.4	0.7	1.5	8.6	0.0	5.1	0.2	5.3	27.8
Michigan	4.2	1.8	6.0	1.5	0.9	0.4	1.2	4.0	0.0	1.9	0.2	2.1	12.0
Minnesota	13.3	4.5	17.8	3.6	5.2	0.9	4.5	14.2	0.1	4.8	0.3	5.1	37.1
Mississippi	1.4	0.7	2.1	0.6	0.3	0.1	0.4	1.4	0.0	0.5	0.0	0.5	4.1
Missouri	9.1	3.2	12.3	1.6	2.4	0.6	1.3	6.0	1.0	3.1	0.9	5.0	23.3
Montana	0.8	0.5	1.3	0.0	0.2	0.1	0.4	0.8	0.0	0.3	0.0	0.3	2.4
Nebraska	3.3	1.1	4.4	0.8	1.0	0.2	0.5	2.5	0.2	1.6	0.3	2.1	9.1
Nevada	3.2	1.6	4.7	1.1	0.0	0.0	1.4	2.5	0.1	1.2	0.5	1.8	9.1
New Hampshire	3.0	1.0	4.0	0.0	0.1	0.2	1.1	1.4	0.0	1.9	0.0	1.9	7.3
New Jersey	9.1	3.0	12.1	2.2	2.9	0.6	1.6	7.2	0.0	6.3	0.1	6.4	25.7
New Mexico	0.2	0.2	0.4	0.1	0.0	0.0	0.1	0.2	0.0	0.1	0.0	0.1	0.8
New York	35.4	12.9	48.3	5.5	18.0	2.6	7.4	33.6	6.0	20.1	11.4	37.5	119.3
North Carolina	5.2	2.0	7.1	1.2	1.9	0.4	1.1	4.7	0.4	1.7	0.1	2.2	14.1
North Dakota	0.6	0.3	0.9	0.2	0.1	0.1	0.5	0.8	0.0	0.2	0.0	0.3	2.0
Ohio	16.8	6.3	23.1	4.0	4.4	1.3	4.6	14.3	0.9	7.5	2.9	11.3	48.8
Oklahoma	4.0	1.9	5.9	0.8	0.9	0.4	1.1	3.2	0.6	0.8	0.1	1.6	10.7
Oregon	2.4	1.2	3.6	0.0	1.2	0.2	0.5	1.9	0.0	1.0	0.2	1.2	6.7
Pennsylvania	15.1	5.9	21.0	3.2	3.8	1.2	4.5	12.7	0.1	6.3	2.5	8.9	42.6
Rhode Island	0.1	0.1	0.2	0.0	0.0	0.0	0.0	0.1	0.0	0.1	0.0	0.1	0.4
South Carolina	5.6	1.5	7.0	1.5	1.4	0.3	0.8	4.0	0.1	2.2	0.4	2.7	13.7
South Dakota	1.2	0.5	1.7	0.4	0.0	0.0	0.3	0.6	0.1	0.4	0.0	0.6	2.9
Tennessee	19.4	4.9	24.3	7.4	0.2	1.0	4.0	12.6	2.4	5.7	1.0	9.1	45.9
Texas	37.5	13.0	50.5	10.7	0.0	2.6	10.7	24.0	2.9	18.0	1.5	22.3	96.9
Utah	1.7	0.9	2.6	0.4	0.5	0.2	0.3	1.4	0.2	0.6	0.1	0.8	4.9
Vermont	0.1	0.1	0.2	0.0	0.0	0.0	0.1	0.2	0.0	0.0	0.0	0.0	0.4
Virginia	8.4	2.6	11.0	1.2	2.8	0.5	1.1	5.6	0.4	3.5	0.9	4.7	21.3
Washington	7.2	3.2	10.4	3.3	0.0	0.7	2.3	6.2	0.8	2.1	0.7	3.7	20.3
West Virginia	2.4	0.9	3.3	0.6	0.8	0.2	1.0	2.6	0.0	0.7	0.2	0.9	6.8
Wisconsin	3.5	1.6	5.1	0.9	1.3	0.3	0.8	3.3	0.1	1.9	0.1	2.1	10.4
Wyoming	0.6	0.4	1.0	0.3	0.0	0.0	0.4	0.7	0.1	0.3	0.0	0.4	2.1
Total US	\$361.4	\$133.7	\$495.1	\$89.4	\$88.5	\$26.6	\$83.9	\$288.4	\$28.5	\$156.3	\$35.7	\$220.6	\$1,004.0

Table 9: Total Federal, State, and Local Taxes Generated by Debt Collection Agencies (Includes direct and indirect tax payments by agencies, suppliers, and employees)

	Total Federal Taxes			Total State Taxes					Total Local Taxes				Total federal, state, local taxes
	Individual Income Tax	Corporate Income Tax	Total Federal Tax	Sales Tax	Individual Income Tax	Corporate Income Tax	Other State Tax	Total State Tax	Sales Tax	Property Tax	Other Local Tax	Total Local Tax	
Alabama	\$7.0	\$2.7	\$9.7	\$1.3	\$1.5	\$0.5	\$1.8	\$5.1	\$1.1	\$1.2	\$0.7	\$3.0	17.8
Alaska	0.8	0.3	1.0	0.0	0.0	0.1	1.3	1.4	0.1	0.3	0.0	0.5	2.9
Arizona	25.5	9.0	34.6	7.0	3.8	1.5	4.7	17.0	4.2	9.0	1.3	14.4	66.0
Arkansas	6.0	1.8	7.8	2.3	1.8	0.4	1.9	6.4	0.8	0.7	0.2	1.6	15.8
California	58.9	19.6	78.6	15.9	23.3	4.7	9.6	53.6	4.6	25.5	4.6	34.6	166.8
Colorado	16.2	5.3	21.4	2.1	4.3	0.8	2.2	9.4	3.0	6.3	1.0	10.3	41.2
Connecticut	2.7	1.0	3.7	0.6	1.1	0.2	0.6	2.4	0.0	1.6	0.0	1.6	7.8
Delaware	5.3	1.6	6.9	0.0	1.8	0.1	3.6	5.5	0.0	1.2	0.4	1.6	14.0
Dist of Columbia	0.1	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.2
Florida	35.1	11.9	47.1	12.5	0.0	2.0	7.5	22.0	0.9	19.8	3.9	24.5	93.6
Georgia	29.5	10.0	39.5	5.9	8.4	1.6	2.7	18.6	4.7	12.1	1.7	18.6	76.7
Hawaii	0.5	0.2	0.6	0.3	0.2	0.0	0.1	0.6	0.0	0.1	0.0	0.2	1.4
Idaho	1.1	0.4	1.6	0.3	0.3	0.1	0.2	0.9	0.0	0.4	0.0	0.4	2.9
Illinois	41.2	12.8	54.0	9.3	8.9	2.1	9.3	29.6	1.4	21.7	3.4	26.6	110.1
Indiana	8.7	3.1	11.8	3.2	2.1	0.5	1.8	7.7	0.0	3.7	0.5	4.2	23.8
Iowa	5.4	1.8	7.2	1.4	1.7	0.3	1.2	4.5	0.4	2.4	0.2	3.0	14.7
Kansas	9.1	2.9	12.0	2.4	3.0	0.5	1.5	7.5	0.9	4.0	0.3	5.2	24.7
Kentucky	7.2	2.6	9.7	2.0	2.2	0.5	2.2	6.9	0.0	1.6	1.3	2.9	19.5
Louisiana	7.4	2.5	9.9	1.6	1.4	0.4	2.1	5.5	2.2	1.7	0.3	4.2	19.6
Maine	0.8	0.3	1.2	0.2	0.3	0.1	0.2	0.8	0.0	0.5	0.0	0.5	2.5
Maryland	9.0	3.0	12.0	1.6	2.7	0.5	1.9	6.8	0.0	2.7	2.7	5.3	24.1
Massachusetts	21.4	6.2	27.7	4.1	8.9	1.5	3.0	17.5	0.0	10.3	0.4	10.6	55.8
Michigan	8.3	3.0	11.3	3.0	1.9	0.5	2.4	7.7	0.0	3.9	0.3	4.2	23.2
Minnesota	26.4	8.1	34.5	7.1	10.3	1.5	8.9	27.8	0.2	9.4	0.6	10.2	72.5
Mississippi	2.4	1.0	3.4	1.0	0.5	0.2	0.6	2.3	0.0	0.8	0.1	0.9	6.6
Missouri	18.3	5.7	24.1	3.3	4.9	0.8	2.6	11.6	2.1	6.2	1.8	10.1	45.7
Montana	1.4	0.7	2.0	0.0	0.4	0.1	0.7	1.2	0.0	0.5	0.0	0.5	3.8
Nebraska	5.3	1.6	7.0	1.3	1.5	0.3	0.8	4.0	0.3	2.5	0.5	3.3	14.3
Nevada	5.7	2.3	8.0	2.0	0.0	0.0	2.6	4.6	0.2	2.2	0.9	3.3	15.9
New Hampshire	5.8	1.7	7.5	0.0	0.1	0.5	2.1	2.8	0.0	3.7	0.1	3.7	14.1
New Jersey	19.3	5.8	25.2	4.7	6.1	1.2	3.3	15.4	0.0	13.3	0.3	13.6	54.1
New Mexico	0.4	0.2	0.6	0.1	0.1	0.0	0.1	0.4	0.1	0.1	0.0	0.2	1.2
New York	67.2	21.8	89.0	10.4	34.3	4.5	14.1	63.2	11.5	38.2	21.6	71.2	223.5
North Carolina	10.0	3.3	13.3	2.4	3.8	0.7	2.2	9.0	0.8	3.3	0.2	4.3	26.6
North Dakota	1.0	0.4	1.3	0.3	0.1	0.1	0.8	1.2	0.0	0.4	0.0	0.4	3.0
Ohio	35.1	11.4	46.5	8.4	9.1	1.4	9.6	28.5	1.9	15.7	6.1	23.7	98.7
Oklahoma	7.6	2.9	10.4	1.5	1.7	0.5	2.1	5.8	1.1	1.6	0.3	3.0	19.3
Oregon	4.6	1.8	6.4	0.0	2.3	0.3	0.9	3.5	0.0	1.9	0.5	2.4	12.3
Pennsylvania	31.9	10.5	42.4	6.8	8.0	1.9	9.5	26.2	0.3	13.3	5.3	18.8	87.4
Rhode Island	0.2	0.1	0.3	0.1	0.1	0.0	0.1	0.2	0.0	0.2	0.0	0.2	0.7
South Carolina	10.9	2.9	13.9	2.8	2.7	0.4	1.7	7.5	0.1	4.3	0.8	5.2	26.6
South Dakota	1.8	0.7	2.5	0.6	0.0	0.0	0.4	1.0	0.2	0.7	0.0	0.9	4.3
Tennessee	40.4	10.7	51.2	15.4	0.4	2.2	8.3	26.3	5.0	11.9	2.1	18.9	96.4
Texas	83.0	25.7	108.7	23.6	0.0	2.6	23.7	50.0	6.4	39.8	3.3	49.4	208.1
Utah	3.5	1.4	5.0	0.9	1.1	0.3	0.6	2.9	0.3	1.2	0.2	1.8	9.6
Vermont	0.2	0.1	0.3	0.0	0.1	0.0	0.2	0.3	0.0	0.0	0.0	0.0	0.6
Virginia	16.8	4.9	21.7	2.3	5.6	0.8	2.2	11.0	0.7	7.0	1.8	9.5	42.1
Washington	14.5	5.2	19.7	6.7	0.0	0.7	4.5	11.9	1.6	4.2	1.5	7.3	38.9
West Virginia	4.1	1.3	5.4	1.0	1.4	0.3	1.6	4.4	0.0	1.2	0.3	1.5	11.2
Wisconsin	6.6	2.5	9.1	1.7	2.4	0.5	1.6	6.2	0.1	3.7	0.1	3.9	19.2
Wyoming	0.9	0.4	1.4	0.4	0.0	0.0	0.7	1.1	0.1	0.5	0.0	0.6	3.0
Total US	\$732.6	\$237.4	\$969.9	\$181.9	\$176.8	\$40.5	\$168.5	\$567.6	\$57.5	\$318.2	\$71.5	\$447.2	\$1,984.8

Table A.1: Number of Data Collection Agencies by State and Number of Employees

State	Total	1-4	5-9	10-19	20-49	50-99	100-249	250-499	500-999	1000+
Alabama	52	15	8	11	5	8	4	1	0	0
Alaska	15	6	4	3	1	1	0	0	0	0
Arizona	137	52	23	19	19	7	10	6	1	0
Arkansas	48	23	8	9	4	1	2	0	1	0
California	509	225	90	75	71	25	19	4	0	0
Colorado	104	38	25	16	13	6	3	2	1	0
Connecticut	42	20	9	5	6	1	1	0	0	0
Delaware	35	14	7	8	1	2	2	1	0	0
District of Columbia	1	1	0	0	0	0	0	0	0	0
Florida	321	171	36	37	43	17	15	0	2	0
Georgia	183	85	27	29	18	10	7	4	3	0
Hawaii	19	10	6	3	0	0	0	0	0	0
Idaho	33	11	14	4	4	0	0	0	0	0
Illinois	208	85	33	28	27	18	12	4	0	1
Indiana	118	46	28	20	14	8	2	0	0	0
Iowa	26	4	6	7	2	2	4	0	1	0
Kansas	56	15	10	15	11	0	3	1	0	1
Kentucky	63	31	11	6	6	4	4	1	0	0
Louisiana	73	21	12	23	10	6	0	1	0	0
Maine	16	8	2	3	2	1	0	0	0	0
Maryland	91	39	17	16	12	5	1	1	0	0
Massachusetts	87	33	18	7	14	8	3	3	1	0
Michigan	113	39	28	25	14	4	3	0	0	0
Minnesota	123	47	20	23	5	12	12	3	1	0
Mississippi	37	12	8	10	3	2	2	0	0	0
Missouri	97	42	7	22	11	9	2	1	3	0
Montana	40	22	6	4	8	0	0	0	0	0
Nebraska	40	15	10	4	6	3	1	0	1	0
Nevada	55	15	10	8	13	6	3	0	0	0
New Hampshire	21	4	1	5	8	1	1	1	0	0
New Jersey	153	74	28	20	18	9	2	0	2	0
New Mexico	17	11	2	2	2	0	0	0	0	0
New York	428	200	70	40	63	25	16	10	3	1
North Carolina	76	30	14	12	9	6	4	0	1	0
North Dakota	17	4	6	5	1	0	1	0	0	0
Ohio	165	57	34	15	24	18	11	4	2	0
Oklahoma	73	27	17	15	5	4	3	2	0	0
Oregon	75	33	19	13	7	1	1	1	0	0
Pennsylvania	238	105	50	28	28	14	8	3	2	0
Rhode Island	5	2	1	1	1	0	0	0	0	0
South Carolina	36	13	5	7	5	2	2	1	1	0
South Dakota	27	13	5	3	3	2	1	0	0	0
Tennessee	96	33	11	11	19	7	9	4	0	2
Texas	368	149	60	57	45	21	20	8	6	2
Utah	53	25	8	10	7	0	3	0	0	0
Vermont	7	4	2	0	1	0	0	0	0	0
Virginia	85	36	13	16	11	5	0	3	1	0
Washington	120	35	29	22	24	5	2	2	1	0
West Virginia	14	5	4	0	3	0	0	0	2	0
Wisconsin	75	24	16	16	12	3	4	0	0	0
Wyoming	17	5	3	3	5	1	0	0	0	0

Table A.2 comes from the survey respondent data. It shows the average debt collected for debt collection agencies of increasing size, as measured by the number of employees. For example, the average debt collected for an agency with one to four employees is almost \$1.6 million dollars, while that for an agency with 50-99 employees is nearly \$28.3 million dollars.

Table A.2: Average Debt Collected for Companies of a given size of employers

Number of Employees	Average Debt Collected (\$K)
1-4	\$1,552
5-9	\$1,458
10-19	\$3,962
20-49	\$18,840
50-99	\$28,280
100-249	\$53,043
250+	\$142,629

Multiplying the average debt collected for a given company size (Table A.2) by the number of companies of that size in a given state (Table A.1) gives the estimates of the total debt collected by state listed in Table 2 of the report.

The economic impact estimates are based on direct impacts obtained through the survey of agencies and the Census Bureau:

- Direct employment is equal to the U.S. Census Bureau reported figures for NAICS 56144, Collection Agencies, with imputations for undisclosed values in Arkansas, the District of Columbia, and West Virginia.
- Direct compensation is equal to reported U.S. Census Bureau payroll in each state plus the amount of agency profit paid to owners, assumed to reside in the state where the agency is located. The profit paid to owners is equal to commissions less operating expenses.
- Direct economic output is equal to commissions.

The indirect and induced economic impacts were estimated using state-level multipliers from the Bureau of Economic Analysis, RIMS-II model for NAICS 56140, Business Support Services. The multipliers are based on 2008 regional data and a 2002 benchmark input-output table, which are the most recent published multipliers available at this level of detail. The total economic impacts are equal to the direct impacts multiplied by the appropriate multiplier for each state.

Direct tax impacts for each state were estimated using data collected in the survey or ratios of historical tax collections to personal income. To estimate direct corporate income tax, the amount of corporate income tax reported by agencies was compared to total debt collected and extrapolated to total responses, adjusting for states with no corporate income tax. Information on direct property tax payments was collected but reflects only the portion of property taxes paid by agencies. The total property tax impact was estimated using the ratio of historical property tax collections to personal income.

Other direct and indirect taxes were estimated, based on the historical ratio of tax collections to personal income, multiplied by the personal income impact in each state. State and local tax collection data was obtained from the U.S. Census Bureau, State and Local Governmental Finances database. Federal tax collection data and personal income data for each state was obtained from the U.S. Bureau of Economic Analysis.

Appendix B – ACA International 2011 State of the Industry Survey Questionnaire

COLLECTIONS

1. In 2010, what was the total amount of dollars collected by your agency for the following account types? This should reflect the full amount you collected, including your agency's commission/fees. For example, if your efforts on a particular account resulted in collection of \$100, of which your agency kept \$20 as a fee or commission, you would report the full \$100 here. Do not remove the commission/fee your agency received. Please provide your answer in US dollars.

Account Type	Amount Collected
On commission/fee based accounts - these are accounts for which you receive a commission or fee based on your ability to collect all or part of the outstanding debt	_____ \$
On purchased accounts – these are accounts which you have purchased from another creditor and now own for collection purposes	_____ \$
Total debt collected in 2010	_____ \$

2. In 2010, what was the total amount of payments earned by your agency on accounts referred to you for collection **as a commission or fee**? This includes any commissions, per account fees, placement fees, etc. For example, if your efforts on a particular account resulted in collection of \$100, of which your agency kept \$20 as a fee or commission, you would only report the \$20 here. Please provide your answer in US dollars.

_____ \$

3. Please provide the amounts of debt collected for the following debt types. The total should sum to the total amount of dollars collected from Question 1.

Debt Type	Amount Collected
Bad Debt	_____ \$
Early Out	_____ \$
Total debt collected in 2010 (Should equal total from Question 1)	_____ \$

4. Of the total gross dollars collected in Question 1. Please provide an approximate percentage breakdown of this amount among the following debt categories.

Debt Category	Percentage of Total Debt Collected
Commercial	_____ %
Credit card/Financial	_____ %
Government	_____ %
Health care	_____ %
Student loan	_____ %
Utility/Telecom	_____ %
Other	_____ %
Total (Should sum to 100%)	100%

EMPLOYEES

5. How many total employees did you employ as of December 31, 2010?

Employee Type	Number of Employees
Full time employees	_____
Part time employees	_____
Contract employees	_____
Total employees	_____

6. How many telephone collectors (counting each employee who communicates with consumers by telephone for any reason) did you employ as of December 31, 2010? _____
7. What was the total number of hours your employees volunteered at company sponsored charitable activities for community organizations/events in 2010, if available? _____

EXPENSES

8. What was your total compensation paid to full time, part time and contract employees in 2010? You should include payments made for salary, bonus, employee benefits, fringe benefits, health insurance payments, 401K contributions, payroll taxes, etc. Do not include proprietor/owner distributions, except for salary paid to any such individuals. Please provide your answer in US dollars. _____ \$
9. What were your total non-labor operating expenses in 2010? Do not include taxes paid – you will report that in the next two questions. Please provide your answer in US dollars. _____ \$
10. What was the total amount of real property tax (on buildings) and personal property taxes (on furniture, equipment, etc) paid in 2010? If your landlord or the lessor of your equipment makes the payments for you, please provide an estimate of the amount paid, if known. Please provide your answer in US dollars. _____ \$
11. What was the total amount of federal and state corporate income or business entity tax, if any, paid in 2010? Please provide your answer in US dollars. (Note: please provide tax liabilities of the collection agency only. For pass-through businesses such as LLCs, S-corps, and partnerships, DO NOT include individual income tax liabilities of owners, members, or partners.)

Tax	Corporate Income Tax Paid
State and Local	_____ \$
Federal	_____ \$
Total tax paid	_____ \$

12. What was the total amount of charitable contributions made by your company in 2010? Please provide your answer in US dollars. _____ \$

Appendix C - US Census Bureau: County Business Patterns series

This series includes the number of establishments, employment during the week of March 12, 2011, first quarter payroll, and annual payroll. This data is useful for studying the economic activity of small areas; analyzing economic changes over time; and as a benchmark for other statistical series, surveys, and databases between economic censuses. Businesses use the data for analyzing market potential, measuring the effectiveness of sales and advertising programs, setting sales quotas, and developing budgets. Government agencies use the data for administration and planning.

ZIP Code Business Patterns data are available shortly after the release of County Business Patterns. It provides the number of establishments by employment-size classes by detailed industry in the U.S. These two programs cover most of the country's economic activity based on establishments, with a few noted exclusions.

For more information see

<http://www.census.gov/econ/cbp/index.html>